

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	Case No. 2:19-CR-20726-PDB-RSW
v.	)	
	)	Hon. Paul D. Borman
EDWARD N. ROBINSON,	)	
	)	
Defendant.	)	

**DEFENDANT’S MOTION TO DELAY VOLUNTARY SURRENDER DATE**

COMES NOW Defendant Edward N. Robinson, by and through his undersigned counsel, and respectfully moves this Court to extend his surrender date, and in support of this Motion, Defendant shows to the Court the following:

1. On January 27, 2021, the Court presided over a hearing at which time the disposition of this case was decided. Edward N. Robinson pleaded guilty to conspiracy to embezzle union funds and conspiracy to defraud the United States in violation of 18 U.S.C. § 371 and was sentenced to a total term of 12 months on both counts, to run concurrently. The Court set a voluntary surrender date and Mr. Robinson is currently scheduled to surrender on August 1, 2021 at 12:00 p.m.

2. Since sentencing, Mr. Robinson has been in and out of the hospital several times with various issues. In March, he went to the hospital and had an appendectomy. After staying there one week, he went home and then seven days

later, after throwing up blood, he went back in the hospital for three days. He went back home and that same night went back to the emergency room. This time, a gallstone was removed, they then removed his gallbladder and he was in the hospital for another seven days. Subsequently, he had a thallium stress test resulting in another stent being placed in the back of his heart. He now has shingles, though that has not required a hospital visit.

3. More relevant to this specific Motion, deterioration of both his hip and back has progressed to the point where his doctors informed him that he likely needs both a hip replacement and back surgery, specifically decompression and posterior lumbar fusion – one following the other after a period of healing. Attached hereto and marked as Exhibit A is a letter from his primary orthopedic doctor.

4. Mr. Robinson's back and hip pain and discomfort have significantly increased since sentencing, and it appears there is not much choice other than going forward with these surgeries.

5. The United States Attorney's Office has no objection to this motion.

6. For these reasons, counsel and Mr. Robinson are seeking a delay in his surrender date. We do not know the exact timing for these two procedures but wanted to bring this to the Court's attention as soon as possible. While we should know more in the next few weeks, we believe the timing for these procedures and recovery will certainly go beyond August 1, 2021.

Dated: June 15, 2021

Respectfully submitted,

DOWD BENNETT LLP

By: /s/ James G. Martin

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*Attorneys for Defendant Edward N.  
Robinson*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 15, 2021, the foregoing was filed using the CM/ECF system, which will automatically provide notice to all attorneys of record by electronic means.

/s/ James G. Martin